

# EXHIBIT 86

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

BILL OF PARTICULARS  
Cr. No. 13-607 (S-1)(JFB)

PHILLIP A. KENNER  
also known as PHILIP A. KENNER  
and TOMMY C. CONSTANTINE,  
also known as "TOMMY HORMOVITIS,"

Defendants.

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The United States of America, by and through its attorney LORETTA E. LYNCH, United States Attorney for the Eastern District of New York, and Diane C. Leonardo, Assistant United States Attorney, hereby files the following Bill of Particulars for the Forfeiture of Property.

This indictment seeks forfeiture of property pursuant to Title 18, United States Code Sections 981 (a)(1)(c), 982(a)(1) and 1956(h); and Title 21, United States Code, Section 853(a). The United States hereby gives notice that, in addition to a forfeiture money judgment and the specific items sought in the indictment, the United States is seeking forfeiture of the following:

- a) All right, title and interest in Baja Ventures 2006, LLC, and all proceeds traceable thereto; and
- b) All right, title and interest in Diamante Properties, LLC, and all proceeds traceable thereto.

The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Central Islip, New York  
April 22, 2015

LORETTA E. LYNCH  
United States Attorney  
Eastern District of New York  
By: /s/ Diane C. Leonardo  
Diane C. Leonardo  
Assistant United States Attorney